

REMARKS

Responsive to the Office Action mailed January 11, 2006, Applicant has studied the Examiner's comments and the cited art. Claims 55–88 are currently pending; after entry of this Amendment, claims 55–85 and 87–88 remain pending. In view of the following remarks, Applicant respectfully submits that the application is in condition for allowance.

Request for Interview Prior to Formal Action on Amendment

Applicant requests an in-person interview prior to formal action on this amendment. An “Applicant Initiated Interview Request Form” accompanies this RCE request. Please contact Clark Jablon, an attorney of record for Applicant in this application, at telephone number 215.965.1293 to schedule the interview.

Amendments

Applicant requests entry of the amendments previously made in Applicant's Response filed April 10, 2006. Applicant has further amended the claims to clarify that the inspector documents recited in the claims are independent of the application objects, amending claims 55–59, 59, 71, 77, 83, 85, and 87–88, and canceling claim 86, incorporating its limitations into independent claim 85. Applicant has further amended independent claims 55, 71, 77, and 85 to clarify that the application executing within the execution environment provides a single view for both end users of the application and developers of the application.

Claim Rejections under 35 U.S.C. § 102(e)

Claims 55–88 are rejected under 35 U.S.C. § 102(e) as being anticipated by Hanson, U.S. Patent No. 5,956,736. Applicant respectfully traverses the rejections.

Hanson fails to recite all of the elements of Applicant's claimed subject matter. Applicant respectfully submits that the Office Action mischaracterizes the features of Hanson.

The Web Document of Hanson is not Independent of the HTML Command Objects

With respect to independent claims 55, 71, 77, and 85, the Office Action asserts that the Web document of Hanson corresponds to the inspector document of Applicant's claimed subject matter. The Office Action further asserts that the HTML command objects of Hanson correspond to the application objects of Applicant's claimed subject matter, which Applicant does not admit. Even if the Web document of Hanson is configurable to describe an attribute of the HTML command objects of Hanson, which Applicant denies, the Web document of Hanson is not independent of those HTML command objects. Instead, the Web document of Hanson is comprised of a collection of those HTML command objects, as detailed below. Because the

Web document actually contains the HTML command objects, it is not independent of them as in Applicant's claimed subject matter.

Hanson is directed to an editor for creating and modifying Web documents comprising a collection of HTML commands. "Each HTML command is treated as a unique object having associated properties."¹ "The objects are dropped into a collection of objects ... Each one of the objects in the collection of objects may be edited by way of a context sensitive object editor to customize the Web document."² Hanson expressly states that the Web document is comprised of the collection of HTML objects.³ The Office Action asserts that the Web document of Hanson is an inspector document as in Applicant's claimed subject matter, but also asserts that the "unique objects" (i.e., the HTML command objects) of Hanson are application objects as in Applicant's claimed subject matter. Because Web document of Hanson is a collection of HTML objects, the Web document clearly is not independent of those HTML objects.

In contrast, Applicant's independent claims recite an inspector document that is independent of the application objects. Applicant's independent claim 55 recites the first inspector document as independent of the first application object. Likewise, Applicant's independent claim 71 recites "a plurality of inspector documents, each associated with one of the plurality of inspector objects and independent of the corresponding application object." Similarly, Applicant's independent claim 77 recites the inspector document as "independent of the application object," while dependent claim 83 recites a step for creating the inspector document independent of the application object. In addition, Applicant's independent claim 83 recites "an inspector document associated with the inspector object and independent of the first application object and the second application object."

Thus, in every independent claim, Applicant's claimed subject matter recites an inspector document that cannot be considered the Web document of Hanson, at least because the inspector document is independent of the recited application object or objects, while the Web document of Hanson actually is comprised of the HTML command objects that the Office Action considers the application objects. For at least these reasons, Applicant respectfully requests withdrawal of the rejections.

Hanson Does Not Disclose an Application that Provides a Single View to End Users and to Developers of the Application

Further with respect to independent claims 55, 71, 77, and 85, the application objects of Applicant's claimed subject matter comprise an application executing in the execution environment, wherein the application provides a single view to end users and developers of the application. Hanson does not disclose such an application.

¹ Col. 4, lines 28–29.

² Col. 4, lines 32–36.

³ Col. 10, lines 25–26 ("a collection of HTML objects comprising a Web document (i.e., Web page).")

Hanson discloses a conventional HTML editor, allowing a developer of a Web document to modify the Web document for later display in a browser. If the Web document is considered an application, which the Office Action implies, but does not expressly state, then clearly the view of the Web document provided to the developer in the editor is not the view of the Web document provided to the end user of the Web document. Hanson expressly denigrates What You See Is What You Get (WYSIWYG) editors,⁴ and the editor of Hanson is not a WYSIWYG editor. Instead, the Page Viewer window 600 provides a representation of the HTML objects comprising the Web document, allowing the developer of the Web document to see the structure of the Web document (see Fig. 6A), but not the actual Web document as would be viewed by the end user. A different application, “a concurrently running Web browser” must be used to preview the Web page being edited. Hanson clearly considers the browser as a separate application, referring to the Web browser as “separate Web browser application software.”⁵ Hanson further states that “a user often positions the Web browser window alongside the object editor window, thereby allowing side-by-side editing and previewing,”⁶ making express the distinction between the developer view (and the editor window) and the end user view (in the browser window). In contrast, Applicant’s claimed subject matter and Specification are directed to a system where

“the developer, or even the user seeking to modify the application, is provided with a “What You See Is What You Get” (WYSIWYG) view of the application even as it is being modified. Because the “development environment” hereby converges with the execution environment, the view provided to the developer and user employing the same execution environment is the same view of the application.”⁷

For these additional reasons, Applicant respectfully requests withdrawal of the rejections.

The Web Document of Hanson is not an Application Executing in the Execution Environment of the Object-Based Editor System

Further with respect to independent claims 55, 71, 77, and 85, the application objects of Applicant’s claimed subject matter comprise an application executing in the execution environment. The HTML command objects of Hanson comprise the Web document, which the Office Action has already asserted is an inspector document. The context sensitive editor window, which the Office Action asserts is an inspector object as in Applicant’s claimed subject matter, executes in the object-based editor system of Hanson. But Hanson does not consider the Web document as an application that executes in the editor system. Furthermore, even if the Web document executes in the editor system of Hanson, which Applicant denies, the Web

⁴ Col. 2, lines 36-51.

⁵ Col. 10, lines 48-51.

⁶ Col. 10, lines 46-48.

⁷ Specification, 16, lines 12-17.

document clearly cannot be said to execute independently of the HTML command objects that comprise it. For these additional reasons, Applicant respectfully requests withdrawal of the rejections.

**The Web Document of Hanson Does Not Describe Attributes of its
Component HTML Commands**

Applicant further respectfully submits one of skill in the art would not consider the Web document as “configurable to describe the first attribute of the first application object,” because the Web document does not describe attributes or properties of the HTML objects that comprise the Web document, but simply embodies those attributes or properties.

The passage cited by the Office Action recites using the HTML editor system of Hanson to create the Web document from a collection of the HTML command objects.⁸ The objects in the collection of HTML command objects “may be edited by way of a context sensitive object editor to customize the Web document.”⁹ The Web document is the output of the HTML editor system in which the context sensitive object editor executes.

Instead of configuring the Web document to describe the attributes of its component HTML command objects, as asserted by the Office Action, each HTML command object is directly configured by the context sensitive editor to customize the Web document. The HTML command object to be edited is selected and dragged to an object editor window where the object’s properties are displayed and may be modified.¹⁰ Nothing in Hanson suggests that the Web document describes the properties of the HTML command object. Instead, a properties display panel 614 is opened by the object editor window, “via which a user is able to directly manipulate the properties associated with the object.”¹¹ Therefore the Web document would not be understood as being “configurable to describe the attributes” of the HTML object. For these additional reasons, Applicant respectfully requests withdrawal of the rejections.

Dependent Claims

Dependent claims 56–70, 72–76, and 78–84, and 86–88 depend from allowable independent claims 55, 71, 77, and 85 and are therefore also allowable, for at least this reason.

In addition, dependent claims 56–59 recite a second inspector document and a second application object, where the second inspector document is variously independent of the first and second application objects and where the first inspector document is also independent of the second application object. For these additional reasons, Applicant respectfully requests withdrawal of the rejections.

⁸ Col. 4, lines 26–28.

⁹ Col. 4, lines 36–39.

¹⁰ Col. 4, lines 36–39.

¹¹ Col. 11, lines 42–44.

Furthermore, with regards to claims 56 and 58, Hanson fails to recite more than one Web document being edited by the HTML editor system at the same time. Thus, even if a Web document is considered an inspector document, which Applicant denies, the system of Hanson does not recite both a first inspector document and a second inspector document as in Applicant's claimed subject matter. For this additional reason, Applicant respectfully requests withdrawal of the rejections.

With respect to claims 62 and 63, the passage cited by the Office Action for archiving the first application object as modified does not recite saving the HTML command objects. Instead, Hanson recites saving the web page that is generated by the collection of HTML command objects. Nothing in Hanson indicates that the HTML editor system is capable of saving or archiving the HTML command objects as that function of these claims requires. For this additional reason, Applicant respectfully requests withdrawal of the rejection.

With respect to claim 64, the Office Action asserts that the execution environment comprises a web browser. The HTML editor of Hanson, which the Office Action previously interpreted as an execution environment, is not a web browser, nor does it include a web browser. Instead, as the passage cited by the Office Action makes clear, the HTML editor of Hanson saves a web page, then signals a "separate Web browser application software" to display that saved web page, which allows the HTML editor user to preview the web page with any Web browser.¹² As shown above, the use by Hanson of a "separate Web browser application software" is related to Hanson's failure to teach or suggest a single view of the application. For these additional reasons, Applicant respectfully requests withdrawal of the rejection.

With respect to claim 66, the Office Action asserts Hanson discloses "wherein the communication between the first inspector object and the first application object modifies the first attribute to be conditionally dependent on a characteristics [sic] of the execution environment (col. 10, lines 35-54)." This mischaracterizes Hanson. The cited passage nowhere recites an HTML command object that produces a Web page conditionally dependent on characteristics of any execution environment. Rather, the cited passage merely describes the user viewing the web page in "any Web browser."¹³ For these additional reasons, Applicant respectfully requests withdrawal of the rejections.

Furthermore, with respect to claim 87, Hanson fails to recite a server that discovers attributes of the first application object and configures the inspector document to describe a first attribute of the attributes of the first application object discovered by the server, where the inspector object uses the inspector document to selectively modify the first attribute. As shown above, the Web document of Hanson is comprised of the HTML command objects that the Office Action considers as application objects. Hanson nowhere describes modifying the Web document directly to change an attribute of one of the component HTML command objects;

¹² Col. 10, lines 48-51.

¹³ Col. 10, lines 48-51.

rather, Hanson recites the opposite approach, modifying the attributes of the HTML command objects to customize the Web document.¹⁴ For this additional reason, Applicant respectfully requests withdrawal of the rejection.

Similarly, with respect to claim 88, Hanson fails to recite an inspector document that is preconfigured to describe a first attribute of the first application object, where the inspector document is configured to use the inspector document to selectively modify the first attribute. For this additional reason, Applicant respectfully requests withdrawal of the rejection.

CONCLUSION

Applicant respectfully submits that all issues and rejections have been adequately addressed, that all claims are allowable, and that the case should be advanced to issuance.

If the Examiner has any questions or wishes to discuss the claims, Applicant encourages the Examiner to call the undersigned at the telephone number indicated below.

Respectfully submitted,

/Richard A. Schafer/

Richard A. Schafer, Reg. No. 45,078

Date: _____

AKIN GUMP STRAUSS HAUER & FELD LLP
1111 Louisiana Street, 44th Floor
Houston, Texas 77002-5200
Telephone: (713) 220-5800
Facsimile: (713) 236-0822

¹⁴ Col. 4, lines 34–36.